

Born, Natascha

From: Born, Natascha
Sent: Tuesday, November 5, 2024 1:33 PM
To: 'Laura King'; Greenfield, Elliot; O'Connor, Maeve; Schaper, Michael; Ceresney, Andrew J.; Schlegelmilch, Stephan J; Hahn, Ashley V.; michael@mjlaw.com; sahuja@dmablaw.com; jacabed@mjlaw.com; 'William Kraus'; ccording@willkie.com; 'Tim Valliere'; cbeal@dmablaw.com
Cc: Philippe Selendy; Andrew Dunlap; Oscar Shine; Todd M. Schneider; Matthew S. Weiler; Sunny S. Sarkis; Srujana Shivji; Xincheng Li; Tether-Team-SG; Tether Team
Subject: RE: In re Tether and Bitfinex Crypto Asset Litigation, 1:19-cv-09236 (S.D.N.Y.): Requests For Admission

Counsel:

The B/T Defendants cannot agree in advance that they will not dispute Plaintiffs' characterization of the almost 4,000 documents that Plaintiffs have identified in their RFAs. Moreover, as we said below, many of the 413 additional RFAs that Plaintiffs served require us to conduct additional research, review documents, and consult with our clients.

Please let us know why Plaintiffs refuse to consent to an extension.

Regards,

Natascha

Natascha Born | Associate | Debevoise & Plimpton LLP | nborn@debevoise.com | +1 212 909 6821 | 66 Hudson Boulevard, New York, NY 10001 | www.debevoise.com

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From: Laura King <lking@selendygay.com>
Sent: Tuesday, November 5, 2024 12:05 PM
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Cc: Philippe Selendy <pselendy@selendygay.com>; Andrew Dunlap <adunlap@selendygay.com>; Oscar Shine <oshine@selendygay.com>; Todd M. Schneider <tschneider@schneiderwallace.com>; Matthew S. Weiler <mweiler@schneiderwallace.com>; Sunny S. Sarkis <ssarkis@schneiderwallace.com>; Srujana Shivji <sshivji@schneiderwallace.com>; Xincheng Li <xli@selendygay.com>; Tether-Team-SG <Tether-Team-SG@selendygay.com>; Tether Team <TetherTeam@schneiderwallace.com>
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EXTERNAL

Counsel:

We are willing to agree to your request for an extension until December 11 for RFA responses regarding authenticity if Defendants agree not to challenge the authenticity of any documents for class cert purposes. For non-authenticity RFAs, we believe it is more efficient for the parties to abide by the current schedule.

We are available to meet and confer.

Best,
Laura

Laura King

Associate [\[Email\]](#)

Selendy Gay PLLC [\[Web\]](#)

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From: Born, Natascha <nborn@debevoise.com>

Sent: Friday, November 1, 2024 5:52 PM

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Counsel:

We write on behalf of the B/T Defendants and Mr. Potter. In light of the volume of RFAs and the need to review relevant documents and consult with our clients regarding the requested admissions, we anticipate that we will need additional time for our responses and objections. Please let us know if you agree to move the deadline back by three weeks, to December 11.

Thanks,

Natascha

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From: Laura King <lking@selendygay.com>

Sent: Friday, October 18, 2024 8:44 PM

To: Greenfield, Elliot <egreenfield@debevoise.com>; O'Connor, Maeve <mloconnor@debevoise.com>; Schaper, Michael <mschaper@debevoise.com>; Ceresney, Andrew J. <aceresney@debevoise.com>; Schlegelmilch, Stephan J <sjschlegelmilch@debevoise.com>; Born, Natascha <nborn@debevoise.com>; Hahn, Ashley V.

<avhahn@debevoise.com>; michael@mjllaw.com; sahuja@dmablaw.com; jacabed@mjllaw.com; 'William Kraus' <william.kraus@pierferd.com>; ccording@willkie.com; 'Tim Valliere' <tvalliere@tavlaw.com>; cbeal@dmablaw.com
Cc: Philippe Selendy <pselendy@selendygay.com>; Andrew Dunlap <adunlap@selendygay.com>; Oscar Shine <oshine@selendygay.com>; Todd M. Schneider <tschneider@schneiderwallace.com>; Matthew S. Weiler <mweiler@schneiderwallace.com>; Sunny S. Sarkis <ssarkis@schneiderwallace.com>; Srujana Shivji <sshivji@schneiderwallace.com>; Xinchun Li <xli@selendygay.com>; Tether-Team-SG <Tether-Team-SG@selendygay.com>; Tether Team <TetherTeam@schneiderwallace.com>

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Counsel,

Please see attached.

Best,
Laura

Laura King

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